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July 30, 2013

Hon. Brian M. Cogan, U.S.D.J.
UNITED STATES DISTRICT COURT
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Shirley T. Burton v. Nations Recovery Center, Inc., et al.
E.D.N.Y. Case No. 1:13-cv-01426-BMC

Dear Judge Cogan,

I am co-counsel of record for Plaintiff in the referenced action. I write pursuant to Your Honor's Individual Practice Rule I.E to request a 30 day extension of time for Plaintiff to move for class certification. The original deadline for Plaintiff to file her motion for class certification is July 31, 2013, and Plaintiff has not made any previous requests for an extension.

I am pleased to inform the Court that the Parties have reached an agreement to resolve this case on a class basis. That said, the Parties need additional time to resolve a couple of non-material issues and to finalize and execute the class settlement agreement. Once the Parties have finalized and executed their class settlement agreement, they intend to file a joint motion for class certification and preliminary approval of the agreement.

Accordingly, Plaintiff respectfully requests an extension of time until August 30, 2013, to move for class certification.

Respectfully submitted,
s/William F. Horn
William F. Horn
via ECF Filing Only
cc: All Counsel of Record *via ECF Filing*